REMARKS

Claims 17 and 19-21 remain in this application. No claim stands allowed.

Claims 17 and 19-21 stand rejected as unpatentable over *Razin* (US 6,125,377) in view of *Felt* (US 6,092,092), *Fein* (US 6,088,711), and *Newbold* (US 5,576,955). The applicants respectfully traverse that rejection.

The claims define a method for improving formatting consistency within a document. Claim 17 is independent, and the method of that claim comprises (in combination with certain other elements) determining whether a formatting run is the smallest section of text within a document having the same formatting attributes; if an inconsistency of the formatting run is determined relative to a consistency rule set, identifying both a majority case and a minority case of the inconsistencies; and revealing those minority and majority cases to a user. Claim 17 defines a "majority case" as a set of formatting properties associated with the most formatting runs in the document and having an analogous formatting property. That claim defines a "minority case" as a set of formatting properties that is inconsistent with the majority case, as the consistency rule set defines the inconsistency.

The rejection acknowledges that *Razin* does not disclose:

"*... wherein the formatting run is the smallest section of text within the document having the same formatting attributes*",

but asserts that *Felt* discloses that omission, citing the Abstract; column 5, lines 34-67 *et seq.*; and also Figs. 2-5.

However, a close reading of *Felt* fails to teach that limitation as required by Claim 17. Instead, *Felt* discusses so-called style runs "associated with a contiguous group of

characters having the same style" (column 5, lines 39-40). Lines 41-48 of column 5 define such "style runs". Similar parsing of character strings appears elsewhere in *Felt*, for example, at column 6, lines 21-26, where the expression "Now is the time" is composed of different styles producing three style runs: One for "now" (three letters), one for "is" (two letters), and one for "the time" (seven letters, one space). None of *Felt's* example "style runs" shows more than a single example of a style, and so those examples do not support the finding that *Felt* discloses "... the formatting run is the smallest section of text... having the same formatting attributes".

Moreover, *Felt* actually teaches combining style runs for characters having the same style (column 6, lines 56-60). That teaching is contrary to the "... smallest section of text..." requirement of Claim 17. Nowhere does *Felt* teach that the formatting run must be the smallest section of text within the document having the same formatting attributes. That requirement is simply missing from *Felt*, which actually teaches away from that limitation.

The rejection also recognizes that the principal reference *Razin* does not specifically disclose:

> "*In response to determining that an inconsistency exists, identifying a majority case and a minority case of inconsistencies:*
>
> *a majority case is a set of formatting properties that is associated with the most formatting runs in the document having an analogous formatting property, and*
>
> *a minority case is a set of formatting properties that is inconsistent with the majority case as the inconsistencies defined by the consistency rule set;*"

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However, the rejection asserts that *Fein* provides that discloses missing from *Razin*. The applicants respectfully submit that *Fein* fails to disclose the majority case/minority case limitation required by the method of Claim 17.

Fein does mention "Major Formatting Properties" (Table 1) and "Minor Formatting Properties" (Table 2) in Column 8. However, those major and minor formatting properties in *Fein* are very different from the majority case and minority case sets of formatting properties defined in Claim 17. In *Fein*, "Major Formatting Properties" are those that match all the major formatting properties of an existing style, i.e., a style which has been defined previously for the document (column 7, lines 52-55). The applicants' majority case, in contrast with *Fein*, is "a set of formatting properties... associated with the most formatting runs in the document having an analogous formatting property (see also the specification, page 17, lines 17-23)".

In the present invention, the "majority case" is determined by formatting properties associated with the most runs in the document, not with a set of predefined rules as with *Fein*.

Fein's "Minor Formatting Properties" amount to *any* formatting property that is not a major formatting property (column 7, lines 65-66). Table 2 of *Fein* illustrates that his minor formatting properties bear no apparent relation to the major formatting properties listed in Table 1. That is, *Fein's* minor properties are not "inconsistent with the majority case as the inconsistency is defined by the consistency rule set" as in Claim 17, but instead are a mere collection of formatting properties different from the major properties of Table 1.

Claim 17 requires, as a majority case, a set of formatting properties associated with the most formatting runs in the document having an analogous formatting property. The *minority case* in Claim 17 is a set of formatting properties <u>inconsistent with the majority case</u>, not merely directed to unrelated other formatting properties as in *Fein's* minor formatting properties. Accordingly, *Fein* fails to teach that requirement of the method defined by Claim 17.

The rejection admits that *Razin* does not specifically disclose:

Revealing the minority case and the majority case to the user

Newbold is cited as disclosing that element of Claim 17. However, because the combination of references fails to teach the minority case and the majority case <u>as</u> <u>claimed</u> by Claim 17, it follows that *Newbold* fails to disclose any such limitations. *Newbold* merely provides an Error List from which the user can then correct or ignore error selections (column 4, lines 33-52).

Based on the foregoing analysis of the art applied in the rejection, the applicants respectfully submit that one of ordinary skill in the art would not have been put in possession of the invention defined by Claim 17, at the time the applicants made their invention. Instead, several elements of that claimed invention would have remained untaught to the routine practitioner, relying only on the teachings of those references. For those reasons, Claim 17 defines an unobvious and therefore patentable combination over the applied art.

Claim 19 depends on Claim 17 and is patentable over the applied art for the reasons set forth above. Furthermore, the rejection of Claim 19 asserts that *Newbold* discloses "in response to revealing a minority case to a user, offering a suggested case

format to the user", citing various portions of *Newbold*. That reliance on *Newbold* is misplaced. Nothing in that reference discloses or suggests offering a suggested case format to the user in response to revealing a minority case, as the claim requires. Column 3, lines 63 *et seq*. simply says that an "error unit" is generated when an error is detected. This error unit contains information about the detected error, with an example given at lines 1-8 in column 4 of *Newbold*. However, nothing in that reference specifically discloses offering a suggested case format to the user in response to revealing a minority case to a user, as required by Claim 19 —and as a minority case is defined by parent Claim 17. Accordingly, Claim 19 is patentable over the applied art for that further reason.

Claim 20, depending from Claim 19, further comprises determining whether the suggested case format (suggested in response to a minority case) is accepted and, if so, reformatting the minority case to the suggested case format. *Newbold* is said to disclose this element of the present invention. However, the applicants must again point out that *Razin-Felt-Fein-Newbold* fail to teach a minority case (as defined by Claim 17); or in response to revealing a minority case to a user, offering a suggested case format to the user (Claim 19); and thus fail to determine whether a suggested case format is accepted by the user, or reformatting the minority case to the suggested case format. These teachings simply are not present in the four applied references, and one of ordinary skill cannot find the recited element in those references without resorting to the applicants' disclosure. For those additional reasons, Claim 20 is patentable thereover.
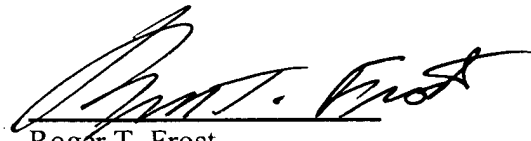
Turning to Claim 21, the rejection asserts that the cited combination of art further discloses, in a context of parent Claim 19, wherein the suggested case format is the

majority case. One problem with that rejection is that only *Fein*, of the four applied references, mentions "major" and "minor" formatting properties. (As pointed out above, *Fein's* major/minor formatting properties are not the same as the applicants' majority case and the minority case sets of formatting properties claimed herein.) Accordingly, because the applied art does not include the majority case/minority case as claimed, neither *Fein* nor *Newbold* disclose the method wherein the suggested case format is the majority case. For that further reason, Claim 21 is patentable over the applied art.

The foregoing is submitted as a complete response to the Office action identified above. The applicants respectfully submit that the present case is in condition for allowance and solicit a notice to that effect.

Respectfully submitted,

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